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JAMES DOUGLAS BELL

UNITED STATES DISTRICT COURT  
EASTERN OF CALIFORNIA

JAMES DOUGLAS BELL,

Plaintiff,

v.

UNION PACIFIC RAILROAD  
COMPANY, and DOES 1-50,  
inclusive,

Defendants.

No. CIV-S-03-1272 LKK/GGH

Trial Date:	8/29/06
Pre-Trial Conf.:	5/30/06
Motion Hg Cut-off:	2/27/06
Discovery Cut-off:	12/27/05
Expert Disclosure:	10/28/05

**STIPULATION AND ORDER TO EXTEND TIME  
FOR EXPERT DISCLOSURES AND DISCOVERY CUT-OFF**

IT IS HEREBY STIPULATED AND AGREED by and between plaintiff James D. Bell and defendant Union Pacific Railroad Company that the deadline for initial expert witness disclosures be extended from the current date of October 28, 2005 to November 28, 2005 and that the discovery cut-off date be extended from December 27, 2005 to January 27, 2006. An extension of these deadlines is necessary because Larry Lockshin, the attorney who is most familiar with the case and will try this matter, underwent back surgery on October 3, 2005; his treating physician, Dr. Paul Slosar, estimates the Mr. Lockshin's recovery from surgery to the point where he can again resume full-time work activities is, absent any unforeseen complications, three months. [See, Oct. 11, 2005 Dr. Slosar Note attached hereto as **Exhibit 1.**] Mr. Lockshin has been out of the office since his operation and is not expected to return until early November on a part-time basis, if that. Plaintiff is therefore unable to make disclosures on the current date and needs more time until Mr. Lockshin returns to the office. The parties do not anticipate that an extension of the other scheduling dates will be necessary.

IT IS SO STIPULATED AND AGREED.

Dated: October 27, 2005

LARRY LOCKSHIN, ESQ.  
A Law Corporation

By: \s\ Diana Esquivel  
Larry Lockshin  
Diana Esquivel

Attorneys for Plaintiff

Dated: October 27, 2005

UNION PACIFIC R.R. CO. LAW DEPARTMENT

By: \s\ Michael Johnson  
Michael Johnson

Attorneys for Defendant Union Pacific R.R. Co.

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**ORDER EXTENDING DEADLINES FOR EXPERT DISCLOSURES &  
DISCOVERY CUT-OFF**

Based on the parties' stipulation and good cause appearing,

IT IS HEREBY ORDERED that the deadline for disclosure of expert witnesses is extended to November 28, 2005, the discovery cut-off date is EXTENDED to January 27, 2006, and the law and motion cut-off date is EXTENDED to March 27, 2006. All other dates remain the same.

**IT IS SO ORDERED.**

Dated: November 8, 2005

/s/Lawrence K. Karlton  
Lawrence K. Karlton  
Senior Judge